

Sean Hartfield OSB #02059
E-mail: sean@hartfieldlaw.com
HARTFIELD LAW OFFICES PC
PO BOX 11153
Portland, OR 97211
Phone: (503) 200-8533
ProSe Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SEAN L. HARTFIELD,

Case No.: 3:11-CV-100-KI

Plaintiff,

**DECLARATION OF
SEAN HARTFIELD
(In support of Plaintiff's Unopposed
Motion for Extension of Time to
Complete Discovery, and File Pleadings
and Dispositive Motions.**

vs.

**LEO BESNER, individually and in
his official capacity as an officer of
the Portland Police Department, and
the CITY OF PORTLAND,
a municipal corporation,**

Defendants.

I, Sean Hartfield, do hereby declare and state that:

1. I am the plaintiff and an attorney appearing pro se in this matter;
2. I have prepared this declaration in support of Plaintiff's Unopposed Motion for Extension of Time to complete discovery, file pleadings and dispositive motions.

3. On May 25, 2011 this Court issued a discovery and pretrial scheduling Order setting a case schedule setting discovery to be completed by September 30, 2011, and dispositive motions to be filed by October 28, 2011;
4. Plaintiff is requesting an extension of time for the completion of discovery and filing of pleadings and dispositive motions through November 29, 2011;
5. There have been significant difficulties in scheduling depositions. The completion of Defendant Besner's deposition is currently scheduled for September 30, 2011 and half of the deposition of Chief Reese is currently scheduled for October 18, 2011. The latter half of Chief Reese's deposition remains unscheduled;
6. After the completion of discovery, the parties will file respective motions for summary judgment;
7. Defense counsel, Scott Moede, consents to the filing of the request for extension of time;
8. This motion is presented in good faith and is not for purposes of undue delay.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THAT THE STATEMENTS MAY BE USED AS EVIDENCE IN COURT AND ARE SUBJECT TO PENALTY FOR PERJURY.

Dated this September 29, 2011

/s/ Sean Hartfield
SEAN HARTFIELD, DECLARANT
Pro Se Attorney for Plaintiff
503-200-8533